

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: DAYTON A. WHYTE <i>aka</i>	:	Chapter 13
DAYTON ANDREW WHYTE <i>aka</i>	:	Case No. 5:15-bk-04752-RNO
DALTON WHITE <i>aka</i>	:	
DALTON ANDREW WHITE <i>aka</i>	:	
DALTON ANDREW WHITE	:	
f/d/b/a Monavie <i>aka</i>	:	
DALTON A. WHITE	:	
Debtor,	:	

WELLS FARGO BANK, N.A.,	:	
Movant,	:	
v.	:	Motion for
	:	Relief from Stay
DAYTON A. WHYTE <i>aka</i>	:	
DAYTON ANDREW WHYTE <i>aka</i>	:	
DALTON WHITE <i>aka</i>	:	
DALTON ANDREW WHITE <i>aka</i>	:	
DALTON ANDREW WHITE	:	
f/d/b/a Monavie <i>aka</i>	:	
DALTON A. WHITE	:	
Respondents	:	

**ANSWER TO MOTION OF WELLS FARGO BANK, N.A.
FOR RELIEF FROM STAY**

AND NOW COMES Debtor, Dalton A. Whyte, by and through his attorneys, Newman Williams, P.C., and in Answer to the Motion for Relief from Stay of Wells Fargo Bank, N.A. avers as follows:

1. Admitted.
2. Admitted only that Debtor executed the Debt Agreement. The remaining allegations are denied as statements or conclusions of law.
3. Admitted.
4. Admitted in part and denied in part. It is admitted Movant is the holder of a mortgage against the property. The remaining allegation is denied. This is a second mortgage.

5. Denied to the extent the averments of paragraph 5 constitute anything other than a statement or conclusion of law or misplaced request for relief.

6. Admitted.

7. Denied. Debtor lacks sufficient information and belief as to the averments of paragraph 7 and such are therefore denied.

8. Denied to the extent the averments of paragraph 8 constitute anything other than a statement or conclusion of law or misplaced request for relief.

9. Admitted. Debtor has no objection to such contact to the extent it is designed to assist him in retaining the Property.

10. Denied to the extent the averments of paragraph 10 constitute anything other than a statement or conclusion of law or misplaced request for relief. Movant has not alleged grounds for such extraordinary relief.

WHEREFORE, Debtor, Dalton A. Whyte, respectfully requests this Honorable Court Order that the Motion of Wells Fargo, N.A. for Relief from Stay be denied, and for such other and further relief as the Honorable Court deems just and appropriate.

NEWMAN WILLIAMS, P.C.

By: /s/ Robert J. Kidwell
ROBERT J. KIDWELL, ESQUIRE
Attorneys for Debtor
PO Box 511, 712 Monroe Street
Stroudsburg, PA 18360
(570) 421-9090; fax (570) 424-9739
rkidwell@newmanwilliams.com